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Attorneys for Defendants
ELMER WHEELER and SANNA LIGOURI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TIMPHONY L. WALKER,

Plaintiff,

vs.

SANTA CLARA COUNTY DEPARTMENT OF
CORRECTION OFFICERS WHEELER,
LIGOURI, CORRECTIONAL SERGEANT
CORSO, CORRECTIONAL LIEUTENANT FRED
HINK, RICHARD WITTENBERG-COUNTY
EXECUTIVE, JIM BABCOCK-CHIEF OF
CORRECTIONS, SANTA CLARA COUNTY
DEPARTMENT OF CORRECTION, SANTA
CLARA BOARD OF SUPERVISORS, AND
DOES, I-V.,

Defendants.

CASE NO.: C-04-00022 VRW (PR)

**JOINT STIPULATION AND
~~PROPOSED~~ PROTECTIVE ORDER**

Complaint Filed: January 6, 2004

WHEREAS, Plaintiff Timphony Walker, by and through his attorney of record, and Defendants Elmer Wheeler and Sanna Liguori, by and through their attorney of record, have stipulated to a Protective Order filed with this Court on October 17, 2006;

WHEREAS, the Protective Order did not purport to cover medical records of Plaintiff, Timphony Walker produced by Patton State Hospital;

THEREFORE, Plaintiff and Defendants further stipulate as follows:

1. The medical records of Timphony Walker produced by Patton State Hospital Bates Numbers PTN 000001 to 002704 shall be covered by the terms of the protective order filed with this Court on October 17, 2006.

2. All medical records of Timphony Walker shall be deemed confidential pursuant to the terms of the protective order, even if they are not so marked.

3. Defendants may only use the medical records for purposes of the above captioned litigation and not in any other matters Plaintiff may have against the County of Santa Clara.

4. Upon case disposition, Defendants agree to dispose of all of the medical records of Timphony Walker (and all duplicates and/or copies thereof) or return same to the Plaintiff.


5. This Order is subject to modification pursuant to written stipulation between the parties and/or appropriate motion procedures.

IT IS SO STIPULATED

Dated: October 19, 2006

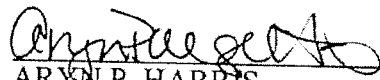
COBLENTZ, PATCH, DUFFY & BASS LLP

By:


REBECCA M. ARCHER
Attorneys for Plaintiff
TIMPHONY L. WALKER

1 Dated: October 19, 2006

ANN MILLER RAVEL
County Counsel

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3
4 By: 
5 ARVIN P. HARRIS
6 Lead Deputy County Counsel
Attorneys for Defendants
Officers Wheeler and Liguori

7 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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9
10 VAUGHN WALKER
11 U.S. District Court Judge

12 Dated: October 25, 2006

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